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Constitutional Law Taking Private Property for Public Use—Forbidding the Use of Land for Advertising Purposes—Quære, as to the Right in Virginia to Tax Advertising.—Forbidding the use of land near a park or park way for advertising purposes is held, in *Com. v. Boston Advertising Co.* (Mass.), 69 L. R. A. 817, to amount to a taking of it for public use, for which compensation must be made.

Pleading and Practice—Replevin Will Lie for Growing Strawberry Plants although They Are Attached to the Soil.—That replevin lies for growing strawberry plants, although they are attached to the soil, is declared in *Cannon v. Mathews* (Ark.), 69 L. R. A. 827, since they are fruits of industry, and must be treated as chattels.

Personal Injury—Occupant of Lower Floor Blocking Stairway Leading to the Ground.—The occupant of the lower floors of a building, who blocks the stairway leading from the upper floor to the ground, so that a tenant of such floor, in seeking to escape a fire, is compelled to drop a considerable distance to reach the ground, is held, in *Cohn v. May* (Pa.), 69 L. R. A. 800, to be liable for the injury resulting to him therefrom.

Injunction—Bill—Verification.—In *Baltimore Bargain House v. St. Clair, et als.*, 52 S. E. 660, the supreme court of appeals of West Virginia held, that a bill of injunction may be sworn to by the agent or attorney of the plaintiff, but, if so, it must appear from the verification that the person verifying the bill knows the contents thereof; otherwise, the verification is fatally defective.

Curtesy—Wife Not Actually Seized of Premises during Her Lifetime.—In *Collins v. Russell et als.*, decided by the court of appeals of New York, February 13, 1906, it was held, that a husband is not entitled to curtesy in improved lands in which his wife had only a residuary estate and was never actually seized of the premises, and who died while the life tenant was still in possession. This is so though the estate was created by deed.

Discharge of Debt—Payment of Less than Is Due.—The payment of less than is due is held, in *Dreyfus v. Roberts* (Ark.), 69 L. R. A. 823, to discharge the debt when an agreement to that effect is fully executed, and the discharge is evidenced by a written receipt for the lesser sum in full satisfaction of the greater one.

Personal Injury—Railroads—Stile over Wire Fence Adjoining Railroad Station—Duty of Company to Repair.—A railroad company